√

BASIC AMERICAN FOODS

c: Dan
Ken.
Kevin
PRO
IFRO

T1-060315

APPLICATION FOR RENEWAL OF TIER I AIR OPERATING PERMIT

BLACKFOOT FACILITY OF BASIC AMERICAN FOODS (A DIVISION OF BASIC AMERICAN, INC.)

June 2006

ORIGINAL

Coal Creek Environmental Associates, LLC
4621 118th Ave SE
Bellevue, WA 98006

RECEIVED
JUN 12 2006
Department of Environmental Quality
State Air Program

TABLE OF CONTENTS

LIST OF APPENDICES

LIST OF TABLES

LIST OF FIGURES

Tables and figures are located after the main document text.

1. INTRODUCTION AND CERTIFICATION BY RESPONSIBLE OFFICIAL

This document is an Application for renewal of Tier I Air Operating Permit No. 011-00012 ("the current Tier I Permit") for the Basic American Foods (BAF) Blackfoot Plant located in Blackfoot, ID (AIRS Facility No. 011-00012). This application includes required information as required by IDAPA 58.01.01, Section 314.

Appendix A contains Completeness Determination forms for the application. Section 2 and Appendix B of this Application contain information requested in Section 1 of the Idaho Department of Environmental Quality (DEQ) Air Quality Operating Permit Application Forms. Additional descriptions of facility operations and emissions are included in subsequent sections of the application.

2. GENERAL INFORMATION FOR THE FACILITY

Company and Division Name	Blackfoot Facility of Basic American Foods, a Division of Basic American, Inc.
Street Address	415 W. Collins Road Blackfoot, ID 83221
Exact Plant Location	415 W. Collins Road Blackfoot, ID 83221
Contact Person	Deloris Aguilar Idaho Environmental Superintendent (208)785-8306
General Nature of Business/Product	Dehydrated food products and animal feed
Number of full-time employees and property area	530 employees 164 acres
Reason for Application	2 – Tier I Permit to Operate
Distance to Nearest State Border	67 miles
Primary and Secondary SIC	2034
Plant Location County	Bingham
Elevation	4480' MSL
UTM Zone UTM X (Easting) UTM Y (Northing)	12 387.7 4783.9
Name and Location of Other Facilities	Rexburg Facility of Basic American Foods, a Division of Basic American, Inc. Shelley Facility of Basic American Foods, a Division of Basic American, Inc.
Responsible Official	Nelson Rovig, Director, Idaho Operations

In accordance with IDAPA 58.01.01.123 (*Rules for the Control of Air Pollution in Idaho*), I, Nelson Rovig, certify based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Signature: _____ Date: 6/9/06

GENERAL DESCRIPTION OF PROCESSES USED AND PRODUCTS PRODUCED

The BAF Blackfoot Plant is located south of U.S. Highway 26 and about two miles northwest of Blackfoot. BAF's Blackfoot facilities include:

- A food drying and dehydrating plant; and
- A co-located research and development laboratory related to vegetable dehydrating and product development.

A portion of the Blackfoot Plant is leased to Idaho Fresh Cooperative as a fresh potato packing operation. This portion of the plant is operated by Idaho Gold and Liberty Produce, both of whom are district members of the Idaho Fresh Cooperative.

Figure 2-1 shows the plant location on a USGS map. Figure 2-2 is a site plan of the Blackfoot facilities.

The Blackfoot Plant produces a variety of dehydrated food products for both internal use and for customers. BAF uses a variety of dehydration technologies to produce products to meet exacting customer specifications.

PRODUCTS

Plant products are described below.

a) Dehydrated potato granules.

Potato granules are individual potato cells prepared from raw potatoes by cooking, followed by gentle drying. Granules typically range from 50 to 120 microns in size. Most of the granules produced at the Blackfoot Plant are used at the Blackfoot Plant; occasionally granules are shipped to other BAF plants for use in products produced at those plants. BAF can also sell granules as a product.

b) Formulated dehydrated food products.

Formulated products are prepared from various combinations of dried ingredients, fresh and fresh-cooked ingredients, and food additives. BAF dries these formulations to create final products.

c) Dehydrated whole and piece food products

BAF prepares dehydrated whole and piece food products by dehydrating cooked and/or blanched foods. These foods can be either whole vegetables or vegetable pieces. Piece products range up to several inches in diameter.

d) Animal feed.

Animal feed, consisting of food fractions and off-specification materials that are not suitable for use in other products, is produced as a co-product of other plant processes. BAF uses various materials classification processes to segregate, collect,

and transport animal feed. Animal feed is transferred directly to load out operations after collection without further processing.

RAW MATERIALS

Plant raw materials include uncooked food products, dehydrated food products produced at this or other locations and various additives and flavorings used in plant products. BAF receives fresh potatoes both directly and from Idaho Gold and Liberty Produce.

Fresh potatoes can be either processed directly or stored in cellars on-site, pending packing or processing.

PRODUCTION PROCESSES

BAF uses a variety of drying and dehydration processes. Products are dried by contact with heated air. Drying air is heated either by direct-firing with natural gas or indirectly using steam heat exchangers. Air suspension unit processes are also used to classify materials and to remove unsuitable fractions from the production stream.

MATERIALS TRANSPORT ACTIVITIES

Materials transport occurs both internally within a processing activity and externally to transfer materials between processes, to place them into or take them out of bulk storage, or to transport them to packaging and load out activities. BAF uses air suspension systems to transport granules and most formulated products; these suspension processes include air slides and pneumatic bulk transfer operations. BAF also uses belt and bucket conveyors at various locations in its operations to transport raw materials, products in processing, and finished products. All bucket and belt conveyors are entirely contained within enclosed buildings. BAF also uses wet flumes to transport raw potatoes. Fork lifts are used to transfer tote containers within the plant.

Materials recovery units (primarily cyclones) are integral to the operation of all unit processes in which granules or formulated products are suspended in air.

SHIPPING AND RECEIVING

Raw materials are received on site by truck. Granules can be received by rail as well as by truck. All shipments are by rail or truck. Trucks are also used to move potatoes to and from the on-site cellars.

FUEL USAGE

Fuel usage at the plant is primarily for steam production, for operation of direct fired product dryers, and for space heating. Plant steam boilers can operate on natural gas,

distillate (#2) oil, and residual (#6) oil. Direct fired product dryers and plant space heaters are fired by natural gas.

GENERAL DESCRIPTION OF EACH PROCESS LINE

For purposes of the Tier I Air Operating Permit, activities at the plant are divided into five process activities. Each of the processes is described generally below. Additional details of process operations are presented in Section 3. Figure 2-3 is a plantwide process schematic.

PLANT

The "Plant" process includes site activities that are plant-wide in nature or that are not associated with a specific production process at the plant. Plant processes include overall facility management, utility services, shipping and receiving, operation of potato storage cellars, space heating and cooling, analytical laboratories, and maintenance and grounds keeping activities.

BOILERS

Three boilers provide process steam for the Blackfoot Plant from the combustion of fuel. Fuels combusted include natural gas, #2 fuel oil, and #6 fuel oil.

PROCESS A

Process A produces dehydrated potato products via a series of cooling, drying, and materials separation processes. Drying heat is provided by both natural gas combustion and steam produced by the plant boilers.

PROCESS B

Process B produces dehydrated potato products via a series of cooling, drying, and materials separation processes. Drying heat is provided by both natural gas combustion and steam produced by the plant boilers.

PROCESS C

Process C produces dehydrated food products via a series of cooling, drying, and materials separation processes. Drying heat is provided by both natural gas combustion and steam produced by the plant boilers. Process C also includes materials transport and packaging processes.

CHANGES IN PROCESSES AND OPERATIONS SINCE THE CURRENT TIER I PERMIT WAS ISSUED

The current Tier I Permit was issued to the BAF Blackfoot facility on December 11, 2002. A major modification to the current Permit was issued on October 4, 2005.

Since issuance of the current Permit, BAF has completed the following projects that were subject to obtaining a Permit to Construct:

- Reequipping of Boiler 1 to combust #6 oil.

  This project was completed in 2004. Idaho DEQ issued Permit to Construct P-040300 for this project on March 22, 2004. Changes in process and operations made in conjunction with this project included:

  - Recommencing combustion of #6 oil in Boiler 1.
  - Increasing fuel throughput of #2 oil for Boiler No. 1,
  - Increasing the allowable sulfur content for #2 oil from 0.05% to 0.5% by weight and establishing the allowable sulfur level for #6 oil at 1.5%.
  - Raising the Boiler No. 1 stack height to 100 feet, and
  - Installing external oil heaters and connecting a compressed air supply to aid in atomizing the fuel inside the boiler.

  Because Boiler 1 was capable of accommodating #6 oil when installed in 1982, these modifications did not trigger applicability of 40 CFR 60 Subpart Dc of the New Source Performance Standards ("NSPS").

  Operation of Boiler 1 with the modifications in place did not violate any terms or conditions of the existing Tier I operating permit and it complied with Subsection 380.02 per IDAPA 58.01.01.209.05.a.iii. Accordingly, modification of the Tier I permit was not required as part of this project, but the applicable requirements contained in the modified permit to construct were to be incorporated into the Tier I operating permit during this renewal, per IDAPA 58.01.01.209.05.a.iv.

  On August 20, 2004 BAF entered into a Consent Order with the State of Idaho regarding Case No. E-010007. This Consent Order modified several provisions of Permit to Construct P-040300.

- Refiring of Boilers 1 and 2

  Construction of this project has been completed and initial performance testing was conducted the week of June 5, 2006. Principal changes in process and operations made in conjunction with this project include:

  - Removing limits on operating hours for Boilers 1 and 2 and establishing other limits on fuel usage and steam production to limit boiler emissions.
  - Modifying Boiler 2 to combust #6 oil.

- Increasing the maximum allowable sulfur content of #6 oil combusted in Boilers 1 and 2 to 1.75%.
- Increasing the maximum allowable sulfur content of #2 oil combusted in Boilers 1 and 2 to 0.5%.
- Establishing limits on boiler firing rates when combusting fuel oil and on the total amount of #6 oil combusted.
- Installing a scrubber on the exhaust from Boiler 1 and scrubbing the Boiler 1 exhaust whenever fuel oil is combusted in Boiler 1.
- Combining the exhausts from Boiler 2 with the exhaust from Boiler 1 and scrubbing the exhaust from Boiler 2 whenever Boiler 2 combusts fuel oil.
- Providing continuous emission monitoring for opacity and sulfur dioxide emissions for the exhaust from Boilers 1 and 2 when fuel oil is combusted in either of these boilers.

In conjunction with this permitting action, DEQ replaced hourly limits on Boiler 3 operations with limits on the amounts of #2 oil and natural gas that can be combusted in Boiler 3.

DEQ issued Permit to Construct P-050301 for this project. The provisions of Permit to Construct P-050301 supplanted the provisions of all previous Permits to Construct issued for this project and of BAF's Consent Order with the State of Idaho regarding Case No. E-010007.

3. EMISSIONS INVENTORY AND DESCRIPTIONS OF EMISSIONS UNITS

This section presents a plantwide emissions inventory, based on maximum potential emissions. The inventory includes emissions from both significant and insignificant emissions units.

Descriptions of emission units follow the emissions inventory. The discussions of emissions units are organized by plant process line.

EMISSIONS INVENTORY

Air emissions from the Blackfoot Plant are associated with the following activities:

- Products of combustion associated with process steam generation in plant boilers;
- Products of combustion associated with firing natural gas to supply heated air to dryers;
- Food and food product particulates generated by drying operations;
- Food product particulates incompletely recovered from air suspension materials transport processes.
- Conversion of sulfite to sulfur dioxide in drying processes.
- Fugitive dust generated by vehicle traffic.

Table 3-1 presents estimated potential annual emissions for particulate matter (PM) and for criteria pollutants associated with each emissions unit.

The only activity at the Blackfoot Plant that produces Hazardous Air Pollutant (HAP) emissions is fuel combustion. Table 3-2 summarizes HAP emission factors for #6 oil, #2 oil, and natural gas (the three fuels that can be combusted at the plant). Table 3-3 summarizes HAP emissions associated with various fuel combustion options. As Table 3-3 indicates, maximum potential HAP emissions are 2.9 tons year, which is well below the levels at which the plant would be a major source of HAPs emissions (10 tons per year for any given HAP or 25 tons per year for all HAPs combined).

Appendices B and C provide calculation details for the emission estimates in Tables 3-1 through 3-3, including emission factors selected, hourly emission rates, and calculation details.

DESCRIPTIONS OF EMISSIONS UNITS

Plant production processes were listed in Section 2. This section of the Tier I permit application describes each of these processes in more detail.

The information presented for each process includes:

- A description of process operations
- A list of emissions units associated with the process, separated into significant and insignificant emissions units.
- Identification and quantification of fuels, fuel use, raw materials, production rates, and operating schedules needed to determine or regulate emissions.
- Identification and description of air pollution control equipment and compliance monitoring devices and activities.
- Identification and description of all limitations on source operation and all work practice standards affecting emissions.

PLANT

DESCRIPTION OF PROCESS OPERATIONS

The "Plant" process includes site activities that are plant-wide in nature or that are not associated with a specific production process at the plant. Plant processes include overall facility management, utility services, shipping and receiving, operation of potato storage cellars, space heating and cooling, analytical laboratories, and maintenance and grounds keeping activities.

The space heaters are potential sources of carbon monoxide, nitrogen oxides, particulates, sulfur dioxide, volatile organics and certain HAPs and TAPs associated with fuel combustion. Vehicle traffic on plant roads is a potential source of fugitive dust emissions.

There is a small incinerator on-site that was formerly used to destroy confidential business information documents. The incinerator is no longer operable. The access door to the unit is chained shut, and the fuses have been removed from the electrical supply panel. Because the incinerator has been rendered physically inoperable, it is not included in the plant emissions unit inventory.

SIGNIFICANT EMISSIONS UNITS

The Plant process includes the following significant emissions units:

Emissions Unit Identification	Description of Unit
REYCO – Slice	Direct fired, natural gas 13 MMBtu/hr capacity. Installed 1982.

Emissions Unit Identification	Description of Unit
REYCO – Old Slab 1	Direct fired, natural gas. 7.5 MMBtu/hr capacity. Installed 1990. Because the unit is designed and sized for comfort space heating, annual operation is practically limited to no more than 50% of full fire.
REYCO – Old Slab 2	Direct fired, natural gas. 7.5 MMBtu/hr capacity. Installed 1990. Because the unit is designed and sized for comfort space heating, annual operation is practically limited to no more than 50% of full fire.
REYCO – Prep	Direct fired, natural gas. 7.5 MMBtu/hr capacity. Installed 1990. Because the unit is designed and sized for comfort space heating, annual operation is practically limited to no more than 50% of full fire.
REYCO – Building 2 Roof	Direct fired, natural gas. 6 MMBtu/hr capacity. Installed 1997. Because the unit is designed and sized for comfort space heating, annual operation is practically limited to no more than 50% of full fire.
REYCO – Building 3	Direct fired, natural gas. 6 MMBtu/hr capacity. Installed 2002. Because the unit is designed and sized for comfort space heating, annual operation is practically limited to no more than 50% of full fire.

INSIGNIFICANT EMISSIONS UNITS

The following "Plant" process activities are insignificant emissions units on the basis of size or production rate, per IDAPA 58.01.01, Section 317.01.b:

- Operation, loading, and unloading of storage tanks and storage vessels, with lids or other appropriate closure and less than 260-gallon capacity, heated only to the minimum extent necessary to avoid solidification.
- Operation, loading and unloading of storage tanks not greater than 1,100 gallons capacity with lids, not containing hazardous air pollutants and with maximum vapor pressure of five hundred fifty (550) mm Hg.
- Operation, loading and unloading of volatile organic compound storage tanks, 10,000 gallons capacity or less, with lids or other appropriate closure and vapor pressure not greater than 80 mm Hg at 21 deg. C.
- Operation, loading, unloading, and storage of butane, propane, or liquefied petroleum gas (LPG) in storage tanks or vessels less than 40,000 gallons capacity.

- Operation, loading and unloading of gasoline storage tanks, 10,000 gallons capacity or less, with lids or other appropriate closure.
- Combustion sources, less than 5 million BTU/hr, exclusively using natural gas, butane, propane, and/or LPG.
- Welding using not more than one ton/day of rod.
- "Parylene" coaters using less than 500 gallons of coating per year.
- Printing and silkscreening, using less than 2 gallons per day of any combination of inks, coatings, adhesives, fountain solutions, thinners, retarders, or nonaqueous cleaning solutions.
- Water cooling towers, not using chromium-based corrosion inhibitors, not using barometric jets or condensers, not greater than 10,000 gallons per minute, and not in direct contact with gaseous or liquid process streams containing regulated air pollutants.
- Industrial water chlorination, less than 20 MGD capacity.
- Surface coating, using less than 2 gallons per day.
- Space heaters and hot water heaters using natural gas, propane or kerosene and generating less than 5,000,000 BTU/hr.
- Tanks, vessels and pumping equipment, with lids or other appropriate closure, for storage or dispensing of aqueous solutions of inorganic salts, bases and acids, excluding solutions with: 99 per cent or greater sulfuric or phosphoric acid; 77 per cent or greater nitric acid; 30 per cent or greater hydrochloric acid; or more than one liquid phase where the top phase is more than one per cent volatile organic compounds.
- Equipment, with lids or other appropriate closure, used exclusively to pump, load, unload or store high boiling point organic material, with initial boiling point not less than 150 deg. C or vapor pressure not more than 5 mm Hg at 21 deg. C.
- Milling and grinding activities (paste forms, if used, are less than one per cent volatile organic compounds).
- Rolling, forging, drawing, stamping, shearing, and spinning metals.
- Dip-coating operations using materials with less than one per cent volatile organic compounds.
- Surface coating, aqueous solution or suspension containing less than one per cent volatile organic compounds.
- Cleaning and stripping activities and equipment, using solutions having less than one per cent volatile organic compounds by weight (no acid cleaning or stripping on metal substrates).
- Storage and handling of water based lubricants for metal working with organic content less than 10 percent.

The aggregate burner capacity of all plant space heaters (including both significant and insignificant emissions units) is 72.3 MMBtu/hr. For purposes of the air emissions inventory, all plant space heaters are aggregated into a single emissions unit with a burner capacity of 72.3 MMBtu/hr.

Plant space heaters are designed and sized for comfort space heating during cold weather periods. For purposes of estimating hourly emissions, all plant heaters are assumed to operate at maximum firing rates simultaneously. During warm weather periods the heaters do not operate; in fact, due to the amount of heat released into the building by production processes, extensive cooling of air is required to maintain temperatures suitable for plant operations during warm weather periods. Accordingly, the space heaters operate at no more than 50 per cent of firing capacity on an annual basis. This is a practical and effective limit on operations, as higher operating rates are an operating condition that is contrary to design and that would be detected and corrected.

BOILERS

The Boilers process is for the plant generation of steam through indirect heating.

PROCESS DESCRIPTION AND OPERATIONS

Three boilers provide process steam for the Blackfoot Plant. The boilers operate pursuant to PTC P-050301, issued by the Idaho Department of Environmental Quality on September 16, 2005.

Boilers 1 and 2 combust #6 oil, #2 oil, or natural gas. Boiler 3 combusts #2 oil or natural gas. Figure 3-1 is a process flow diagram for boiler operations.

The boilers are potential sources of nitrogen oxides, particulates, sulfur dioxide, volatile organics, and carbon monoxide. Minimal amounts of hazardous air pollutants and lead associated with fuel combustion are emitted from this process.

SIGNIFICANT EMISSIONS UNITS

Each boiler is a point source of emissions. Information on each boiler is summarized in the Emissions Unit Data Tables in Appendix B. This process includes the following significant emissions units:

Emissions Unit	Description of Unit
Boiler 1	Boiler 1 is a Murray (unknown model) with a rated heat input of 57 MMBTU/hr, and a maximum steam rate of 45,500 lb/hr. Boiler 1 can combust #6 oil, #2 oil, or natural gas.

Emissions Unit	Description of Unit
Boiler 2	Boiler 2 is a Johnston "509" Series, with a rated heat input of 75.4 MMBTU/hr, and a maximum steam rate of 62,100 lb/hr. Boiler 1 can combust #6 oil, #2 oil, or natural gas.
Boiler 3	Boiler 3 is a Springfield Model 52, with a rated heat input of 39 MMBTU/hr, and a maximum steam rate of 30,000 lb/hr. Boiler 3 can combust natural gas or #2 oil.

INSIGNIFICANT EMISSIONS UNITS

There are no insignificant emissions unit associated with the Boilers process. Insignificant activities associated with the boiler process are included in the insignificant activities listed provided above for plantwide activities.

EMISSION LIMITS

Emissions from boilers are subject to the enforceable limits listed below:

- Hourly and annual emissions of PM_{10}, SO_2, NOx, and CO from Boilers 1, 2, and 3 shall not exceed the following limits

Criteria Pollutant Emission Limits[A] - Hourly (lb/hr) and Annual[b, c] (T/yr)

Source Description	PM_{10}		SO_2		NO_x		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler 1	—	—	—	—	—	—	4.6	—
Boiler 2	—	—	—	—	—	—	6.1	—
Boiler 3	0.30	—	1.9	—	5.4	—	1.8	—
Combined Emissions from Boilers 1 and 2	5.7	—	45.3	—	61.9	—	—	—
Combined Emissions from Boilers 1, 2 and 3	—	18.3	—	145	—	198	—	46

Criteria Pollutant Emission Limits[A] - Hourly (lb/hr) and Annual[b, c] (T/yr)

Source Description	PM_{10}		SO_2		NO_x		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr

[a] As determined by a pollutant specific U.S. EPA reference method, or DEQ approved alternative, or as determined by DEQ's emission estimation methods used in this permit analysis.

[b] As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

[c] T/yr is tons of emissions per any consecutive 12-month period

- NO_x emission from Boilers 1 and 2 shall each not exceed 96.64 pounds per 1000 gallons of fuel when #6 oil is combusted.
- When combusting fuel oil in Boiler 2, SO_2 emissions from Boiler 2 are limited to 0.5 lb/MMBtu, or, alternatively, the sulfur content of the fuel shall not exceed 0.5 wt percent. This limit also applies to Boiler 1 if the exhausts from Boilers 1 and 2 are merged ahead of a single scrubber.
- Visible emissions from Boiler 2 shall not exceed 20 percent opacity (6-minute average), except for one 6-minute period (average) per hour of not more than 27 percent opacity. This limit also applies to Boiler 1 if the exhausts from Boilers 1 and 2 are merged ahead of a single scrubber.
- Visible emissions from Boilers 1, 2, and 3 may exceed 20 percent opacity for no more than an aggregate of three minutes in any 60-minute period.
- Combined emissions of nickel from the exhaust stacks of Boilers 1 and 2 may not exceed the following limits:

TAP	Limit for Combined Emissions from Boilers 1 and 2[a, b, c]
Nickel	240 lb/yr

[a] As determined by a pollutant specific U.S. EPA reference method, or DEQ approved alternative, or as determined by DEQ's emission estimation methods used in this permit analysis.

[b] As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

[c] lb/yr is pounds of emissions per any consecutive 12-month period

- PM emissions may not exceed 0.015 gr/dscf (corrected to 3% oxygen by volume) when combusting gas fuel and 0.050 gr/dscf (corrected to 3% oxygen by volume) when combusting liquid fuel.

- When combusting fuel oil, particulate matter emissions from Boiler 1 may not exceed 13 ng/J (0.030 lb/MMBtu) heat input, except during periods of startup, shutdown, or malfunction in accordance with 40 CFR 60.43c(d).

OPERATING REQUIREMENTS

Boiler operations are subject to the following requirements:

- Boilers 1 and 2 may burn natural gas, distillate oil, or residual oil. Boiler 3 may burn natural gas fuel as primary fuel and low sulfur distillate oil as secondary fuel.
- The sulfur content of fuels burned in the boilers shall not exceed the following amounts:
  - Distillate oil burned in Boiler 3 shall not exceed 0.05% sulfur by weight;
  - Distillate oil burned in Boiler 1 and Boiler 2 shall not exceed 0.5% sulfur by weight
  - Residual oil burned in Boiler 1 and Boiler 2 shall not exceed 1.75% sulfur by weight
- The quantity of natural gas combusted in Boiler 3 shall not exceed 328 million standard cubic feet (MMscf) per year, based on any consecutive 12-month period.
- The quantity of distillate oil combusted in Boiler 3 shall not exceed 393,120 gallons per year, based on any consecutive 12-month period.
- The combined quantity of residual oil combusted in Boiler 1 and Boiler 2 shall not exceed 15,384 gallons per day and 4,097,682 gallons per year, based on any consecutive 12-month period.
- Whenever residual oil is combusted in Boiler 1 or Boiler 2, the combined quantity of steam produced by all three boilers shall not exceed 80,000 pounds per hour, based on a daily average.
- A wet scrubbing system shall be used to control emissions of SO_2 and PM_{10} from Boiler 1 and Boiler 2 as follows:
  - Emissions of SO_2 and PM_{10} from Boiler 1 shall be controlled using a wet scrubber when fuel oil is combusted. When Boiler 1 combusts natural gas, wet scrubbing of the Boiler 1 exhaust is not required.
  - Emissions of SO_2 and PM_{10} from Boiler 2 shall be controlled using a wet scrubber when fuel oil is combusted. When Boiler 2 combusts natural gas, wet scrubbing of the Boiler 2 exhaust is not required.
  - When Boiler 2 combusts distillate or residual oil, Boiler 2 shall exhaust through the stack that serves Boiler 1. When Boiler 2 combusts natural gas, Boiler 2 may exhaust through its own stack.
- The permittee shall install, calibrate, operate and maintain equipment to measure each of the following operating parameters for the wet scrubbing system. When the

wet scrubbing system is required to be operated, each operating parameter shall be maintained within the specifications established in the O&M manual:

- Pressure drop across the scrubber, or DEQ-approved alternative monitoring, for ensuring dispersion and mixing of scrubbing solution with air;
- Scrubbing solution pH; and
- Scrubbing solution flow rate.

- Within 60 days after startup of the wet scrubbing systems, the permittee shall have developed an O&M manual for the wet scrubbing system, which describes the procedures that will be followed to comply with the PTC General Provisions and the manufacturer specifications for the air pollution control device. At a minimum the following items shall be addressed in the manual:
  - The manufacturer's recommended minimum and maximum values, or DEQ-approved alternatives, for each of the following operating parameters: pressure drop, for ensuring dispersion and mixing of the scrubbing solution with the air stream; the scrubbing solution pH; and the scrubbing solution flow rate.
  - Inspection checklists for items that will be periodically inspected while the treatment system is operating, including frequency of inspection.
  - Inspection checklist for items that will be inspected when the device is taken out of operation and physically opened for inspection (e.g., internal components), including frequency of these internal inspections.
  - Periodic planned maintenance for the control devices.

  The contents of the O&M manual shall be based on manufacturer's information to the extent practical. When the manufacturer's information is not used (e.g., a DEQ-approved alternative or performance test information is used in lieu of manufacturer information), this shall be explained in the manual. The O&M manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.
- The burners in each boiler shall be tuned annually to maintain efficient fuel combustion.
- At all times, including periods of startup, shutdown, and malfunction, BAF shall, to the extent practicable, maintain and operate Boiler 2 including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions in accordance with 40 CFR 60.11(d).

AIR POLLUTION CONTROL EQUIPMENT AND COMPLIANCE MONITORING DEVICES AND ACTIVITIES

When combusting fuel oil, emissions from Boilers 1 and 2 are treated in a wet scrubbing system for removal of particulates and sulfur dioxide. The scrubber is a venturi type

system, Model 48x48-96HE, manufactured by Carbo-Tech Environmental Group, Inc. (Burlington, Ontario, Canada).

When the scrubber is operating, exhaust air is contacted with a caustic solution a venturi-type contactor. The air then flows to a separator, where the scrubbing solution separates from the exhaust stream and collects at the bottom of the separator. A pump recirculates the scrubbing solution from the bottom of the separator to the venturi mixer. The pH of the scrubbing solution is continuously monitored, and caustic soda is added to the recirculation line as needed to maintain a pH of between 8 and 8.5 in the scrubbing solution.

Because of the presence of moisture in the scrubbed exhaust gas, operation of a Continuous Opacity Monitor is not feasible. BAF has obtained approval for a NSPS Subpart Dc Alternative to COMS for this project. The Alternative requires that each of the following operating parameters be maintained within the specifications established in the permit or specifications established through source testing under worse case normal conditions.

- Pressure drop across the scrubber
- Scrubbing solution pH
- Scrubbing solution flowrate.
- Fuel consumption
- Steam production (calculated)

When combusting fuel oil, sulfur dioxide emissions are continuously monitored with a Sick Maihak GM 31-1 in-situ SO_2 gas analyzer and FLOWSIC 100 UMD volume flow measuring unit. Data acquisition and reporting software provide for reports to be generated as required by Permit PTC P-050301 and by 40CR60, Subpart Dc.

PLANT PRODUCTION

For air permitting purposes, the Blackfoot Plant production processes are divided into Processes, A, B and C. Information on each of these processes is presented below.

PROCESS A

Process Description and Operations

Process A produces dehydrated potato products. Raw material input to the process is cooked potatoes and food additives, including sulfites. Products are produced via a series of cooling, drying, and materials separation processes, as illustrated in the process flow diagram for Process A (Figure 3-2). The maximum hourly feed rate is 25,000 pounds per hour, average hourly feed rate on the maximum day, with a maximum production rate of 4,200 pounds per hour, average hourly production on the maximum

day. Process A can operate up to 8,760 hours per year. Maximum annual production is 23 million pounds. There are no alternate operating scenarios.

Drying heat is provided by both natural gas combustion and steam produced by the plant boilers.

Emissions from Process A include both process emissions and products of combustion from those sources that combust natural gas as part of the process. Process emissions include:

- PM and PM-10, associated with entrainment and condensation of particulates in exhaust air streams; and
- Sulfur dioxide, associated with conversion of sulfites to sulfur dioxide.

Emissions that are products of natural gas combustion include CO, NOx, SO_2, PM, PM-10, VOC, Pb, and certain HAPs and TAPs.

Process A was constructed in the early 1960s.

Significant Emissions Units

Process A includes the following significant emissions units:

Emissions Unit	Description of Unit
DHQ	DHQ is a vent from a cooler used to cool wet cooked potatoes prior to further processing. The air supply to the cooler is unconditioned room air.
DHT	DHT is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by natural gas combustion. The burners are rated at 7 MMBTU/hr.
DHU	DHU is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by natural gas combustion. The burners are rated at 7 MMBTU/hr.
DHZ	DHZ is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by both steam and natural gas combustion. The burners are rated at 6 MMBTU/hr.

Insignificant Emissions Units

The following Process A activities are insignificant emissions units on the basis of size or production rate, per IDAPA 16.01.01.317.01b:

- DKW
- DKV

Insignificant activities associated with the boiler process are included in the insignificant activities listed provided above for plantwide activities.

Emission Limits

There are no limits on emissions from Process A established in Permits or Orders. Emissions from Process A are subject to the following general limits established by regulations:

- PM emissions

  A source operating prior to October 1, 1979 may not discharge PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

  - If PW is less than 17,000 lb/hr, $E = 0.045(PW)^{0.6}$
  - If PW is equal to or greater than 17,000 lb/hr, $E = 1.12(PW)^{0.27}$

- Visible emissions

  Visible emissions from any point of emission may exceed 20 percent opacity for no more than an aggregate of three minutes in any 60-minute period.

Operating Requirements

There are no applicable operating requirements for Process A.

Air Pollution Control Equipment and Compliance Monitoring Devices and Activities

Process A does not have any required air pollution control equipment or compliance monitoring devices and activities.

PROCESS B

Process Description and Operations

Process B produces dehydrated potato products. Raw material input to the process is cooked potatoes and food additives, including sulfites. Products are produced via a series of cooling, drying, and materials separation processes, as illustrated in the process flow diagram for Process B (Figure 3-3). The maximum hourly feed rate is 50,000 pounds per hour, average hourly feed rate on the maximum day, with a maximum

production rate of 8,400 pounds per hour, average hourly production on the maximum day. Process B can operate up to 8,760 hours per year. Maximum annual production is 46 million pounds. There are no alternate operating scenarios.

Drying heat is provided by both natural gas combustion and steam produced by the plant boilers.

Emissions from Process B include both process emissions and products of combustion from those sources that combust natural gas as part of the process. Process emissions include:

- PM and PM-10, associated with entrainment and condensation of particulates in exhaust air streams; and
- Sulfur dioxide, associated with conversion of sulfites to sulfur dioxide.

Emissions that are products of natural gas combustion include CO, NOx, SO_2, PM, PM-10, VOC, Pb, and certain HAPs and TAPs.

Significant Emissions Units

Process B includes the following significant emissions units:

Emissions Unit	Description of Unit
DUQ	DUQ is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by natural gas combustion. The burners are rated at 7 MMBTU/hr.
DUT	DUT is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by natural gas combustion. The burners are rated at 7 MMBTU/hr.
DUV	DUV is a combined vent from two dryers used to dry food solids as part of a food dehydration process. The dryers are heated by both steam and natural gas combustion. The gas burners are each rated at 6 MMBTU/hr, per dryer.
DQA	DQA is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by natural gas combustion. The burners are rated at 7 MMBTU/hr.
DQB	DQB is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by natural gas combustion. The burners are rated at 7 MMBTU/hr.

Insignificant Emissions Units

The following Process B activities are insignificant emissions units on the basis of size or production rate, per IDAPA 16.01.01.317.01b:

- DXS
- DUO
- DPY
- DPZ
- DUY
- DUZ
- DSO
- DSK
- DUU
- DRY

Insignificant activities associated with the boiler process are included in the insignificant activities listed provided above for plantwide activities.

Emission Limits

There are no limits on emissions from Process B established in Permits or Orders. Emissions from Process B are subject to the following general limits established by regulations:

- PM emissions

  A source operating prior to October 1, 1979 may not discharge PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

  - If PW is less than 17,000 lb/hr, $E = 0.045(PW)^{0.6}$
  - If PW is equal to or greater than 17,000 lb/hr, $E = 1.12(PW)^{0.27}$

- Visible emissions

  Visible emissions from any point of emission may exceed 20 percent opacity for no more than an aggregate of three minutes in any 60-minute period.

Operating Requirements

There are no applicable operating requirements for Process B.

Air Pollution Control Equipment and Compliance Monitoring Devices and Activities

Process B does not have any required air pollution control equipment or compliance monitoring devices and activities.

PROCESS C

Process Description and Operations

Process C produces dehydrated food products. It also includes materials transport and packaging processes. Raw material inputs to Process C include cooked foods, previously dehydrated foods, and food additives, including sulfites.

Products are produced via a series of cooling, drying, and materials separation processes, as illustrated in the process flow diagram for Process C (Figure 3-4a through 3-4f). The aggregate maximum hourly feed rate for dehydration activities is 170,000 pounds per hour, average hourly input on the maximum day, with an aggregate maximum production rate of 40,000 pounds per hour, average hourly production on the maximum day. The aggregate maximum annual production from dehydration activities is 242,000,000 pounds. The packaging and materials transport activities can operate at an aggregated rate of up to 160,000 pounds per hour, with aggregated maximum material handling of 500,000,000 pounds per year. Process C can operate up to 8,760 hours per year.

Drying heat is provided by both natural gas combustion and steam produced by the plant boilers.

Emissions from Process C include both process emissions and products of combustion from those sources that combust natural gas as part of the process. Process emissions include:

- PM and PM-10, associated with entrainment and condensation of particulates in exhaust air streams; and
- Sulfur dioxide, associated with conversion of sulfites to sulfur dioxide.

Emissions that are products of natural gas combustion include CO, NOx, SO_2, PM, PM-10, VOC, Pb, and certain HAPs and TAPs.

Installation of stacks HEB and CTU was authorized by a PTC letter issued November 12, 1982.

Significant Emissions Units

Process C includes the following significant emissions units:

Emissions Unit	Description of Unit
CIR	CIR is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by steam.

Emissions Unit	Description of Unit
CXX	CXX is one of two vents from a dryer used to dry food solids as part of a food dehydration process. This vent serves the front portion of the dryer, which is heated by natural gas combustion (4.4 MMBTU/hr). Air delivered to the dryer also goes through a 6.05 MMBTU/hr preheater that supports both the CXX and CYY stacks.
CYY	CYY is one of two vents from a dryer used to dry food solids as part of a food dehydration process. This vent serves primarily the middle and rear portions of the dyer. These portions of the dryer are heated by natural gas combustion (6.6 MMBTU/hr). Some of the air delivered to this vent also goes through a 6.05 MMBTU/hr preheater that supports both the CXX and CYY stacks. Another portion of the air delivered to this vent passes through a 1.2 MMBTU/hr preheater.
CHX	CHX is a vent from a dryer used to dry food solids as part of a food dehydration process. The overall drying process is heated by natural gas (10.3 MMBTU/hr) and steam. There is also a 2.9 MMBTU/hr natural gas fired preheater.
HEB	HEB is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by steam, with a 6 MMBTU/hr natural gas fired preheater.
CNV	CNV is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by natural gas (12 MMBtu/hr burner capacity.)
CNW	CNW is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by natural gas (12 MMBtu/hr burner capacity.)
CTU	CTU is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by steam.

Insignificant Emissions Units

The following Process B activities are insignificant emissions units on the basis of size or production rate, per IDAPA 16.01.01.317.01b:

- ALB
- ALT
- ALQ
- ALY
- ALX
- ALV
- ALW
- AEV

- AEW
- AGQ
- CHV
- IBE
- CHY
- CHZ
- HNL
- CBB
- CTQ
- CTR
- CTS
- CTT
- TCD
- TCO
- TAC
- TAH
- TEM
- TEE
- ENV
- EUW
- ENR
- EDO
- ESX
- EGS
- EGT
- FIF
- CHK
- CHI

Emission Limits

There are no limits on emissions from Process C established in Permits or Orders. Emissions from Process C are subject to the following general limits established by regulations:

- PM emissions

  A source operating prior to October 1, 1979 may not discharge PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

  - If PW is less than 17,000 lb/hr, $E = 0.045(PW)^{0.6}$
  - If PW is equal to or greater than 17,000 lb/hr, $E = 1.12(PW)^{0.27}$

- Visible emissions

  Visible emissions from any point of emission may exceed 20 percent opacity for no more than an aggregate of three minutes in any 60-minute period.

Operating Requirements

There are no applicable operating requirements for Process C.

Air Pollution Control Equipment and Compliance Monitoring Devices and Activities

Process C does not have any required air pollution control equipment or compliance monitoring devices and activities.

4. APPLICABLE REQUIREMENTS IDENTIFICATION AND COMPLIANCE CERTIFICATION

This section identifies applicable requirements, evaluates the status of compliance with each applicable requirement, and provides the basis for demonstrating and reporting continuing compliance. Applicable requirements are grouped into the following categories:

- Emission Limits
- Operating Requirements,
- Monitoring Requirements
- Recordkeeping Requirements
- Reporting Requirements

This section includes applicable requirements that are contained in a regulation, construction permit, Tier II permit, court order, or other enforceable requirement other than a Tier I permit. This section does not include existing monitoring, recordkeeping, and reporting requirements that are applicable only as "gap-filling" requirements established in the current Tier I permit pursuant to IDAPA 58.01.01.322.

Where a single applicable requirement (such as a regulation or a permit condition) includes requirements in more than one of these areas, the applicable requirement is cited in each relevant category. Also note that that an applicable requirement can also be a monitoring, recordkeeping, or reporting requirement for another applicable requirement.

Applicable requirements are listed by process (as described in Section 2, above) and emissions unit(s). Within each process and emissions unit, applicable requirements are grouped as described above.

The discussion for each identified applicable requirement includes the following information:

- The affected parameter
- Identification of whether the requirement is federally enforceable or is a "state-only" requirement.[1]
- The regulatory citation for the requirement
- A description of the applicable requirement

---

[1] "Federally enforceable" means that the applicable requirement can be enforced by the federal government. This means that the requirement is either a part of federal law, or, if it is a State or local requirement, the requirement is included in the Idaho State Implementation Plan (40 CFR 52, Subpart N). A "state only" requirement is a state or local requirement that is not part of the Idaho State Implementation Plan.

- Citations to any applicable monitoring, recordkeeping, and reporting requirements.[2]
- Evaluation of current compliance status and the basis for determining current compliance status
- A compliance plan for the applicable requirement.

PLANT

This section identifies and discusses compliance with requirements that apply to overall plant operations. Requirements that apply generically to all emissions units or emissions activities (such as general limits on visible emissions and reporting requirements for excess emissions) are included in the Plant process.

The "Plant" process is divided in the following three "emissions units", which reflect the applicability for rules that apply to overall plant operations:

- General Plantwide Activities
- All Emissions Units (Generic)
- Indirect Fired Combustion Units (Generic)

GENERAL PLANTWIDE ACTIVITIES

The "general plantwide activities" emissions unit incorporates all plant activities that are subject to applicable requirements but for which the regulated activity is not a stack emission. This includes required plant management activities and all plant fugitive emissions.

EMISSIONS LIMITS - GENERAL PLANTWIDE ACTIVITIES

There are no plantwide emission limits.

OPERATING REQUIREMENTS - GENERAL PLANTWIDE ACTIVITIES

The following operating requirements apply generically to plant activities.

[2] To reduce the volume of the application, citations are used for monitoring, recordkeeping and reporting requirements that are in reference materials that are currently applicable and available to the public. This includes requirements that are published in the Code of Federal Regulations, the Idaho Administrative Code, and applicable requirements that are described elsewhere in this application. See Section II.F.1 "Cross-Referencing" of EPA guidance for Development of Clean Air Act Part 70 Permit Applications (Issued July 10, 1995).

Fugitive Dust

IDAPA 58.01.01.651

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne. In determining what is reasonable, consideration will be given to factors such as the proximity of dust emitting operations to human habitations and/or activities and atmospheric conditions which might affect the movement of particulate matter.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

In accordance with provisions of the current Tier I Permit, BAF monitors and maintains records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to control fugitive emissions. BAF has also formalized its procedures to maintain records of all fugitive dust complaints and the BAF Idaho Environmental Superintendent conducts routine quarterly monitoring of the plant for fugitive dust emissions. The BAF Idaho Environmental Superintendent also observes plant dust conditions as part of other plant activities.

Since the existing Tier I permit was issued, the plant has not recorded any fugitive dust complaints. In addition, the BAF Idaho Environmental Superintendent has not observed any fugitive dust leaving the plant site.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will continue to maintain records of all fugitive dust complaints received. BAF will take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records will include, at a minimum, the date each complaint was received and a description of the following: the complaint, BAF's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

BAF will continue to conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to insure that all reasonable precautions are being taken to prevent fugitive emissions. If fugitive emissions are observed, BAF will review operations to insure that all reasonable precautions are being taken to prevent fugitive emissions. If fugitive emissions are not being reasonably controlled, BAF will take corrective action as expeditiously as practicable. BAF will maintain records of the results of each quarterly fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Reporting Methods and Frequencies

Results of fugitive emissions monitoring will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Toxic Air Pollutants

IDAPA 58.01.01.161

Any contaminant which is by its nature toxic to human or animal life or vegetation shall not be emitted in such quantities or concentrations as to alone, or in combination with other contaminants, injure or unreasonably affect human or animal life or vegetation.

Enforceability

State-Only

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

In May 2003, BAF submitted an application for Tier II Operating Permit for the Blackfoot Plant. The application included a detailed review documenting compliance with Idaho rules for emissions of Toxic Air Pollutants.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF's approval process for capital projects includes review of potential air emissions permitting requirements. This review includes assessment of compliance with IDAPA 58.01.01.210 and 223. BAF will annually review capital projects to verify that permitting applicability reviews were completed for projects that could affect air emissions.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Sulfur Content of Fuels

IDAPA 58.01.01.725-729

No person shall sell, distribute, use or make available for use, any fuel containing more than the following amounts of sulfur:

- Residual fuel oil: one and three-fourths percent (1.75%) sulfur by weight.
- ASTM Grade 1 fuel oil: 0.3 percent by weight.
- ASTM Grade 2 fuel oil: 0.5 percent by weight.
- Coal: one percent (1.0%) sulfur by weight.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.725

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

The only plantwide use of fuel oil is miscellaneous combustion of diesel fuel in engines. All diesel fuel was obtained from commercial fuel suppliers located within Idaho, all of which are also subject to this requirement.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF does not sell or distribute any fuel oil. The only fuel oil used as part of the "Plant" process is diesel fuel used for internal combustion engines on mobile sources. (Analysis of fuel sulfur content for Boilers is discussed in the review of applicable requirements for Boilers.) BAF will demonstrate compliance by purchasing fuel oil only from commercial fuel suppliers. If the supplier is not located in Idaho, BAF will obtain a certification of fuel oil sulfur content from the supplier and verify that the sulfur content of the fuel meets the limit of IDAPA 58.01.01.725.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Odors

IDAPA 58.01.01.776

No person shall allow, suffer, cause or permit the emission of odorous gases, liquids or solids into the atmosphere in such quantities as to cause air pollution.

Enforceability

State-Only

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Pursuant to the current Tier I permit, BAF maintains records of all odor complaints received. The records include the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

In the last four years, BAF has not received any odor complaints related to plant operations.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will continue to maintain records of all odor complaints received. If the complaint has merit, BAF will take appropriate corrective action as expeditiously as practicable. The records will include the date each complaint was received and a description of the following:

- the complaint,

- the BAF's assessment of the validity of the complaint,
- any corrective action taken,
- the date the corrective action was taken.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Asbestos NESHAP

40 CFR 61, Subpart M

Owners or operators of facilities undergoing demolition or renovation shall comply with applicable provisions of 40 CFR 61, Subpart M (National Emission Standard for Asbestos)

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 61.145(b)

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF has completed surveys of plant buildings and structure to determine the locations and extent of asbestos-containing materials (ACM). BAF's approval process for capital projects includes review of projects with the potential to disrupt ACM. When ACM is present in the project area, the work is conducted in accordance with 40 CFR Part 61.

This review includes assessment of compliance with IDAPA 58.01.01.210 and 223. BAF will annually review capital projects to verify that permitting applicability reviews were completed for projects that could affect air emissions.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will annually review capital projects to verify that project reviews for possible ACM presence were completed and that the provisions of 40 CFR 61 Subpart M were followed when ACM the project included disturbing ACM.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Open Burning

IDAPA 58.01.01.603

No person shall allow, suffer, cause or permit any open burning operation unless it is a category of open burning set forth in IDAPA 58.01.0. 600 through 617 and the materials burned do not include any items prohibited by IDAPA 58.01.01.603.

No person shall allow, suffer, cause or permit any open burning to be initiated during any stage of an air pollution episode declared by the Department in accordance with IDAPA 58.01.01, 550 through 562.

IDAPA 58.01.01.608

Open outdoor fires used for the purpose of weed abatement such as along fence lines, canal banks, and ditch banks is an allowable forms of open burning.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF plant policies prohibit open burning of any type on plant property except for fires for weed abatement such as along fence lines, canal banks, and ditch banks. During monthly inspections of plant grounds, the inspector looks for evidence of open burning activities. In the last four years, no evidence of open burning has been found except for fires for weed abatement along fence lines, canal banks, and ditch banks.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will continue to look for evidence of open burning activities during its monthly inspections of plant grounds. Inspection logs will document any findings of evidence of open burning except for fires for weed abatement along fence lines, canal banks, and ditch banks.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Accidental Chemical Release

40 CFR Part 68

Owners/operators of stationary sources subject to risk management program rules shall prepare and register a risk management program in accordance with rules to be adopted by the U.S. EPA. (The plant is subject to the RMP Program only because of on-site storage of gaseous chlorine.)

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF has completed RMPP planning for the Blackfoot Plant in accordance with 40 CFR 68.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Basic American Foods will annually review the status of its RMP program to verify compliance with 40 CFR 68.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Class I and Class II Refrigerants

40 CFR 82, Subpart F

Emissions of class I and class II refrigerants and their substitutes shall be reduced to the lowest achievable level by complying with applicable standards for recycling and

emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes.

Basis for Determining Current Compliance Status:

BAF has implemented a program to manage Class I and Class II refrigerants in accordance with 40 CFR 82. A review of records for refrigeration units subject to 40 CFR 82 indicates that this facility is in compliance with the requirements of 40 CFR 82.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Basic American Foods will annually review the status of its program to manage Class I and Class II refrigerants to verify compliance with 40 CFR 68.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Permit to Construct Required

IDAPA 58.01.01.201

No owner or operator may commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining a permit to construct from the Department which satisfies the requirements of Sections 200 through 228 unless the source is exempted in any of Sections 220 through 223, the owner or operator complies with Section 213 and obtains the required permit to construct, or the source operates in accordance with all of the applicable provisions of a permit by rule.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

No

Basis for Determining Current Compliance Status:

In May 2003 BAF submitted an Application for Tier II Air Operating Permit for the Blackfoot Plant. In accordance with Provision 9.3 of the existing Tier I Air Operating Permit for the Blackfoot Plant, this Application identified historic changes and modifications to facilities and operations for which BAF should have obtained Permits to Construct. The Application also included information required under IDAPA 58.01.01.200-223, to enable DEQ to include appropriate terms and conditions for these changes, in accordance with. Provision 9.6 of the existing Tier I permit.

As of the date of this submittal DEQ has not issued a Tier II Permit for the Blackfoot Plant. Because BAF has not received a final Tier II permit, BAF has not yet attained compliance with this requirement.

Continuing Compliance Demonstration

Continuing Compliance Certification

After DEQ issues the Tier II Permit for the Blackfoot Plant, BAF will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF's current operating procedures require an environmental review of all capital projects. Part of the review includes assessing whether a Permit to Construct might be required for the project.

To demonstrate compliance, BAF will annually review capital projects for the Blackfoot Plant to verify that the projects received environmental review

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

MONITORING REQUIREMENTS - GENERAL PLANTWIDE ACTIVITIES

The following monitoring requirements apply generically to plant activities.

Performance Testing - Opacity

IDAPA 58.01.01.625

The appropriate test method for monitoring visible emissions under this section shall be EPA Method 9 (contained in 40 CFR Part 60) with the method of calculating opacity exceedances altered as follows:

- Opacity evaluations shall be conducted using forms available from the Department or similar forms approved by the Department.
- Opacity shall be determined by counting the number of readings in excess of the percent opacity limitation, dividing this number by four (4) (each reading is deemed to represent fifteen (15) seconds) to find the number of minutes in excess of the percent opacity limitation. This method is described in the Procedures Manual for Air Pollution Control, Section II (Evaluation of Visible Emissions Manual), September 1986.
- Sources subject to New Source Performance Standards must calculate opacity as detailed above and as specified in 40 CFR Part 60.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

Included in applicable requirement.

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

All opacity readings at the Blackfoot Plant are made by certified opacity readers employed by BAF. A review of opacity monitoring logs was completed to verify that opacity readings are made in accordance with this requirement.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Opacity reading logs will be reviewed to confirm all opacity readings were made in accordance with this requirement.

Reporting Methods and Frequencies

Results of visible emissions monitoring will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Fuel Sulfur Content Analysis

IDAPA 58.01.01.725

The reference test method for measuring fuel sulfur content shall be ASTM method, D129-95 Standard Test for Sulfur in Petroleum Products (General Bomb Method) or such comparable and equivalent method approved in accordance with Subsection 157.02.d. Test methods and procedures shall comply with Section 157.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF does not sell or distribute any fuel oil. Because all of this fuel is obtained from commercial suppliers who themselves are subject to this rule, fuel sulfur analyses are not needed.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will verify that any sulfur analyses of fuel conducted for purposes of demonstrating compliance with IDAPA 58.01.01.725 were performed in accordance with this requirement.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

RECORDKEEPING REQUIREMENTS - GENERAL PLANTWIDE ACTIVITIES

There are no applicable recordkeeping requirements applicable to General Plant Activities.

REPORTING REQUIREMENTS - GENERAL PLANTWIDE ACTIVITIES

There are no applicable reporting requirements applicable to General Plant Activities.

ALL EMISSIONS UNITS (GENERIC)

The "all emissions units (generic)" emissions unit comprises all emissions units at the plant collectively. This emissions unit is associated with air emissions control requirements that apply generically all stack emissions on a plantwide basis.

EMISSION LIMITS - ALL EMISSIONS UNITS (GENERIC)

The following emissions limits apply generically to all plant emissions units.

Visible Emissions

IDAPA 58.01.01.625

No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

In accordance with the current Tier I facility permit, BAF currently conducts a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. This inspection consists of a see/no see evaluation for each potential source using EPA Method 22. If any visible emissions are present from any point of emission, BAF either takes appropriate corrective action as expeditiously as practicable, or performs a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625.

A review of these records indicates that no visible emissions events were noted from any plantwide process stacks. (Compliance with visible emissions limits for stacks associated with specific plant processes is discussed separately in the applicable requirements summary for each individual process.)

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will annually review logs from plant-wide visible emissions surveys to verify compliance with this requirement.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS - ALL EMISSIONS UNITS (GENERIC)

The following operating requirements apply generically to all plant emissions units.

Excess Emissions

IDAPA 58.01.01.132

The person responsible for, or in charge of a facility during, an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing such excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of the Department, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.132, 133, 134, 135, 136

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF has developed and implemented procedures to identify, respond to, document and report excess emissions events in accordance with provisions of IDAPA 58.01.01.132-136.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will continue to implement its procedures to identify, respond to, document and report excess emissions events in accordance with provisions of IDAPA 58.01.01.132-136. BAF provides routine maintenance and repair of cyclones and baghouses, including periodic inspections.

BAF will annually review information on excess emissions events and review process operations to evaluate feasible alternatives for reducing excess emissions events.

Reporting Methods and Frequencies

BAF will continue to submit excess emissions reports for each excess emission event in accordance with IDAPA 58.01.01.135.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Excess Emissions

IDAPA 58.01.01.133

The owner or operator of a source of excess emissions must make the maximum reasonable effort, including off-shift labor where practicable to accomplish maintenance during periods of nonoperation of any related source operations or equipment.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF does not have any equipment that typically creates an excess emission event during scheduled maintenance.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will review excess emissions records to verify that not plant equipment or emissions units have frequent excess emissions during scheduled maintenance. If any plant equipment or emissions units are identified as frequent sources of excess emissions during scheduled maintenance, BAF will develop a program to ensure that maintenance on these items occurs during process downtime.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Excess Emissions

IDAPA 58.01.01.134.01

For all equipment or emissions units from which excess emissions may occur during upset conditions or breakdowns or implementation of safety measures, the facility owner or operator shall:

a. Implement routine preventative maintenance and operating procedures consistent with good pollution control practices for minimizing upsets and breakdowns or events requiring implementation of safety measures, and

b. Make routine repairs in an expeditious fashion when the owner or operator knew or should have known that an excess emissions event was likely to occur. Off-shift labor and overtime shall be utilized, to the extent practicable, to ensure that such repairs are made expeditiously.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF has developed and implemented procedures to identify, respond to, document and report excess emissions events in accordance with provisions of IDAPA 58.01.01.132-136. BAF routinely reviews information on excess emissions events and reviews process operations to evaluate feasible alternatives for reducing excess emissions events.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will continue to implement its procedures to identify, respond to, document and report excess emissions events in accordance with provisions of IDAPA 58.01.01.132-136. BAF provides routine maintenance and repair of cyclones and baghouses, including periodic inspections.

BAF will annually review information on excess emissions events and review process operations to evaluate feasible alternatives for reducing excess emissions events.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Excess Emissions

IDAPA 58.01.01.134.02

For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.132, 133, 134, 135, 136

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF has developed and implemented procedures to identify, respond to, document and report excess emissions events in accordance with provisions of IDAPA 58.01.01.132-136.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will continue to implement its procedures to identify, respond to, document and report excess emissions events in accordance with provisions of IDAPA 58.01.01.132-136. BAF provides routine maintenance and repair of cyclones and baghouses, including periodic inspections.

BAF will annually review information on excess emissions events and review process operations to evaluate feasible alternatives for reducing excess emissions events.

Reporting Methods and Frequencies

BAF will continue to submit excess emissions reports for each excess emission event in accordance with IDAPA 58.01.01.135.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

MONITORING REQUIREMENTS - ALL EMISSIONS UNITS (GENERIC)

The following monitoring requirements apply generically to all plant emissions units.

Source Testing

IDAPA 58.01.01.157

If a source test is performed to satisfy a performance test requirement or a compliance test requirement imposed by state or federal regulation, rule, permit, order or consent decree, then the test methods and procedures shall be conducted in accordance with the requirements of IDAPA 58.01.01.157. The test must be conducted under operational conditions specified in the applicable state or federal regulation, rule, permit, order, consent decree or by Department approval. If the operational requirements are not specified, the source should test at worst-case normal operating conditions. Worst-case normal conditions are those conditions of fuel type, and moisture, process material makeup and moisture and process procedures which are changeable or which could reasonably be expected to be encountered during the operation of the facility and which would result in the highest pollutant emissions from the facility.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

All source tests conducted for performance or compliance demonstration purposes have been completed in accordance with the requirements of this section.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

As part of BAF's annual compliance review, records of source tests conducted will be reviewed to verify compliance with this section.

Reporting Methods and Frequencies

If performance tests are completed, performance test reports will be summarized in BAF's Reports on Monitoring Data that are submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c. This is in additional to source test results reporting pursuant to IDAPA 58.01.01.157.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

RECORDKEEPING - ALL EMISSIONS UNITS (GENERIC)

The following recordkeeping requirements apply generically to all plant emissions units.

Excess Emissions Records

IDAPA 58.01.01.133,134,136

The owner or operator shall maintain excess emissions records at the facility for the most recent five (5) calendar year period. The excess emissions records shall be made available to the Department upon request. The excess emissions records shall include the following:

- An excess emissions log book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to the Department pursuant to Section 135 for the particular emissions unit or equipment; and
- Copies of all startup, shutdown, and scheduled maintenance procedures and upset/breakdown/safety preventative maintenance plans which have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

Included in requirement.

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF maintains an excess emissions log book in accordance with this requirement. In lieu of maintaining separate books for each piece of equipment, the logs are maintained on a spreadsheet. Records for individual pieces of equipment are retrieved by sorting or filtering the spreadsheet rows by piece of equipment.

Preparation of startup, shutdown, and scheduled maintenance procedures and upset/breakdown/safety preventative maintenance plans is optional.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will annually verify that the log book is being maintained and is current.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

REPORTING REQUIREMENTS - ALL EMISSIONS UNITS (GENERIC)

The following reporting requirements apply generically to all plant emissions units.

Excess Emissions Reports

IDAPA 58.01.01.133

The owner or operator of a source of excess emissions shall notify the Department of any startup, shutdown, or scheduled maintenance event that is expected to cause an excess emissions event. Such notification shall identify the time of the excess emissions, specific location, equipment involved, and type of excess emissions event (i.e. startup,

shutdown, or scheduled maintenance). The notification shall be given as soon as reasonably possible, but no later than two (2) hours prior to the start of the excess emissions event unless the owner or operator demonstrates to the Department's satisfaction that a shorter advanced notice was necessary. The Department may prohibit or postpone any scheduled startup, shutdown, or maintenance activity upon consideration of the factors listed in Subsection 134.03.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

There are no processes at the Blackfoot Plant that are expected to create excess emission during startup, shutdown, or scheduled maintenance.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

In its annual review of excess emissions, BAF will review excess emission records to determine if any equipment is prone to excess emissions during startup, shutdown, or scheduled maintenance. If any units are identified, BAF will initiate notification to DEQ of startup, shutdown, and scheduled maintenance.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I

Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Excess Emissions Reports

IDAPA 58.01.01.134

The owner or operator shall notify the Department of any upset/breakdown/safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than twenty-four (24) hours after the event, unless the owner or operator demonstrates to the Department's satisfaction that the longer reporting period was necessary.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

A review of BAF's logbook for excess emissions indicates that DEQ is being notified of any upset/breakdown/safety event that results in excess emissions.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

In its annual review of excess emissions, BAF will review excess emission records to verify that that DEQ is being notified of upset/breakdown/safety events that results in excess emissions.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Excess Emissions Reports

IDAPA 58.01.01.133, 134, 135

A written report for each excess emissions event shall be submitted to the Department by the owner or operator no later than fifteen (15) days after the beginning of each such event. Each report shall contain the following information:

a. The time period during which the excess emissions occurred;

b. Identification of the specific equipment or emissions unit which caused the excess emissions;

c. An explanation of the cause, or causes, of the excess emissions and whether the excess emissions occurred as a result of startup, shutdown, scheduled maintenance, upset, breakdown or a safety measure;

d. An estimate of the emissions in excess of any applicable emission standard (based on knowledge of the process and facility where emissions data is unavailable);

e. A description of the activities carried out to eliminate the excess emissions; and

f. Certify compliance status with the requirements of Sections 131, 132, 133.01, 134.01 through 134.03, 135, and 136.

g. If requesting consideration under Subsection 131.02, certify compliance status with Sections 131, 132, 133.01 through 133.03, 134.01 through 134.05, 135, and 136.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

A review of BAF's logbook for excess emissions indicates that written reports have been submitted to DEQ for each excess emissions event in accordance with this requirement.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

In its annual review of excess emissions, BAF will review excess emission records to verify that that written reports have been submitted to DEQ for each excess emissions event in accordance with this requirement.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

INDIRECT FIRED COMBUSTION UNITS (GENERIC)

The "indirect fired combustion units (generic)" emissions unit comprises all emissions units at the plant collectively that:

- are *"fuel-burning equipment"* (as defined in IDAPA 58.01.01.006.40); and
- are insignificant emissions units.

This emissions unit is associated with air emissions control requirements that apply generically to fuel burning equipment. Presently, the only combustion units included in this emissions unit are indirect-fired plant space heaters.

EMISSION LIMITS - INDIRECT FIRED COMBUSTION UNITS (GENERIC)

The following emissions limits apply generically to all indirect fired combustion units.

Particulate Matter

IDAPA 58.01.01.675 through 681

Particulate matter emissions from fuel burning equipment with a maximum rated input of ten (10) million BTU's per hour or more, and commencing operation on or after October 1, 1979 shall not exceed 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products. Particulate matter emissions from fuel-burning equipment placed in operation prior to October 1, 1979 or with a maximum rated input of less than ten (10) million BTU's per hour, shall not exceed 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.100 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.200 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

When two (2) or more types of fuel are burned concurrently, the allowable emission shall be determined by proportioning the gross heat input and emission standards for each fuel.

In determining compliance emissions shall be averaged according to the following, whichever is the lesser period of time:

- One (1) complete cycle of operation; or
- One (1) hour of operation representing worst-case conditions for the emission of particulate matter

Standard conditions shall be adjusted for the altitude of the source by subtracting one-tenth (0.10) of an inch of mercury for each one hundred (100) feet above sea level from the standard atmospheric pressure at sea level of twenty-nine and ninety-two one hundredths (29.92) inches of mercury.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157; IDAPA 58.01.01.681

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

There are no generic indirect-fired combustion units at the plant with more than 10 MMBtu/hr rated heat input capacity.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will verify that no indirect fired space heaters exceeding 10 MMBtu/hr rated heat input capacity have been installed. If any such units are installed, BAF will document compliance with this standard by emission calculations using AP-42 emission factors.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS - INDIRECT FIRED COMBUSTION UNITS (GENERIC)

There are no applicable operating requirements applicable to Indirect-Fired Combustion Units.

MONITORING REQUIREMENTS - INDIRECT FIRED COMBUSTION UNITS (GENERIC)

The following monitoring requirements apply generically to all indirect fired combustion units.

Performance Testing - PM from Fuel Burning Equipment

IDAPA 58.01.01.681

The appropriate test method for particulate matter emissions from fuel-burning equipment shall be EPA Method 5 contained in 40 CFR Part 60 or such comparable and equivalent method approved in accordance with IDAPA 58.01.0.157.02.d. Test methods and procedures shall also comply with IDAPA 58.01.01.157.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF has not been required to conduct performance testing on any generic indirect fired combustion units.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

If required to conduct performance testing on any generic indirect fired combustion unit, BAF will conduct the testing in accordance with this section.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I

Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

REPORTING REQUIREMENTS - INDIRECT FIRED COMBUSTION UNITS (GENERIC)

There are no reporting requirements applicable to Indirect-Fired Combustion Units.

RECORDKEEPING REQUIREMENTS - INDIRECT FIRED COMBUSTION UNITS (GENERIC)

There are no recordkeeping requirements applicable to Indirect-Fired Combustion Units.

BOILERS

The Boilers process comprises the three steam boilers. Boiler applicable requirements include requirements that apply to individual boilers, to Boilers 1 and 2 in tandem, or to Boilers 1, 2, and 3 collectively.

BOILER 1

The discussion below provides information on applicable requirements that apply specifically to Boiler 1. Applicable requirements that apply to Boiler 1 in tandem with Boiler 2 or that apply collectively to all boilers are described separately.

EMISSION LIMITS – BOILER 1

The following emission limits apply to Boiler 1.

Visible Emissions

40 CFR 60.13(g); PTC No. P-050301, Sec 2.4

When the exhausts from Boiler 1 and 2 are merged ahead of a single scrubber to comply with Condition 3.5 of PTC No. P-050301, the exhaust from Boiler 1 shall be subject to the same visible emissions limits set forth for Boiler 2 in Condition 2.3 of PTC No. P-050301, and BAF may install applicable continuous monitoring systems on each effluent or the combined effluent from Boilers 1 and 2 in accordance with 40 CFR 60.13(g).

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

PTC No. P-05030, Sec 4.6.1
40 CFR 60.11(e)
40 CFR 60.7(f)
40 CFR 60.48c(i)
PTC No. P-050301, Condition 4.10.2
PTC No. P-050301, Condition 5.2
40 CFR 60.48c(j)
PTC No. P-050301, Condition 5.1.6
NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005), Provision 1

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

The exhausts from Boilers 1 and 2 are merged when fuel oil is combusted. Records from performance testing of opacity (using an alternative opacity monitoring plan approved by EPA pursuant to 40 CFR 60.13(i)) indicate that Boiler 1 is meeting the visible emissions limits when combusting fuel oil.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance will be demonstrated using boiler operating logs and monitoring data from the approved opacity monitoring plan.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Sulfur Dioxide

40 CFR 60.13(g); PTC No. P-05030, Sec 2.4

When the exhausts from Boiler 1 and 2 are merged ahead of a single scrubber to comply with Condition 3.5 of PTC No. P-050301, the exhaust from Boiler 1 shall be subject to the same sulfur dioxide emissions limits set forth for Boiler 2 in Condition 2.2 of PTC No. P-050301, and BAF may install applicable continuous monitoring systems on each effluent or the combined effluent from Boilers 1 and 2 in accordance with 40 CFR 60.13(g).

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 64.2
PTC NO. P-050301, Condition 4.6
40 CFR 60.46c,
PTC No. P-05030, Sec 4.4
40 CFR 60.7(b)
40 CFR 60.48c(e)
PTC No. P-050301, Condition 5.1.5
40 CFR 60.48c(j)
PTC No. P-050301, Condition 5.1.6
PTC No. P-050301, Condition 5.2

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

The exhausts from Boilers 1 and are merged when fuel oil is combusted. Records from the sulfur dioxide continuous emissions measurements systems (CEMS) indicate that Boiler 1 is meeting the sulfur dioxide emissions limits.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance will be demonstrated using boiler operating logs and monitoring data from the sulfur dioxide CEMS.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Carbon Monoxide

PTC No. P-05030, Conditions 2.1 and 6

Emissions of carbon monoxide from the exhaust stack of Boiler 1 shall not exceed 4.6 lb/hr, as determined by a pollutant specific U.S. EPA reference method (or DEQ approved alternative), or as determined DEQ's emission estimation methods used in this permit analysis.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance with the emission limit is based on emission calculation methods used by DEQ in the permit analysis and from tuning of Boiler 1 in accordance with PTC No. P-050301, Condition 3.8. Tuning of the boiler helps ensure that the emission factors used to estimate emissions are still valid.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance will be demonstrated by estimating emissions from boiler operating records (fuel usage or steam production) and emission factors used in the permit analysis. Tuning of Boiler 1 in accordance with PTC No. P-050301, Condition 3.8 will help ensure that the emission factors used to estimate emissions are still valid.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS – BOILER 1

There are no operating requirements that apply specifically to Boiler 1. Operating requirements that apply to Boiler 1 in tandem with Boiler 2 or to all boilers collectively are presented separately, below.

MONITORING REQUIREMENTS – BOILER 1

There are no monitoring requirements that apply specifically to Boiler 1. Monitoring requirements that apply to Boiler 1 in tandem with Boiler 2 or to all boilers collectively are presented separately, below.

RECORDKEEPING REQUIREMENTS – BOILER 1

There are no recordkeeping requirements that apply specifically to Boiler 1. Recordkeeping requirements that apply to Boiler 1 in tandem with Boiler 2 or to all boilers collectively are presented separately, below.

REPORTING REQUIREMENTS – BOILER 1

There are no reporting requirements that apply specifically to Boiler 1. Reporting requirements that apply to Boiler 1 in tandem with Boiler 2 or to all boilers collectively are presented separately, below.

BOILER 2

The discussion below provides information on applicable requirements that apply specifically to Boiler 2. Applicable requirements that apply to Boiler 2 in tandem with Boiler 1 or that apply collectively to all boilers are described separately.

EMISSION LIMITS – BOILER 2

The following emission limits apply to Boiler 2.

Particulate Matter

40 CFR 60.43c(e)(1); 40 CFR 60.43c(d)

No owner or operator of an affected facility that commences construction, reconstruction, or modification after February 28, 2005, and that combusts coal, oil, gas, wood, a mixture of these fuels, or a mixture of these fuels with any other fuels and has a heat input capacity of 8.7 MW (30 MMBtu/h) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that contain particulate matter emissions in excess of 13 ng/J (0.030 lb/MMBtu) heat input.

The particulate matter emission standard applies at all times, except during periods of startup, shutdown, or malfunction in accordance with 40 CFR 60.43c(d).

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.45c(a)
40 CFR 60.8
40 CFR 60.11
40 CFR 60.8(d)
40 CFR 60.44c(a)
40 CFR 60.8(f)
IDAPA 58.01.01.157

Evaluation of Current Compliance

In Compliance Now?

Yes.

Basis for Determining Current Compliance Status:

For purposes of this application, compliance is based on engineering calculations of estimated emissions and anticipated performance of wet scrubber. The estimated emissions presented in Appendices B and C reflect estimated emissions from BAF's Application for Permit to Construct for Permit PTC-030501, which are based on 50% scrubber efficiency. Compliance with this requirement would require 79% scrubber efficiency, which is believed to be attainable with this scrubber.

An initial performance test of Boiler 2 was also conducted on June 6 and 8, 2006 to verify compliance with this requirement. BAF is awaiting results of this performance test. The results of this performance test will establish BAF's compliance with this requirement.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Particulate emissions from Boiler 2 while firing fuel oil are controlled by a wet scrubber. The initial performance test demonstrated that the scrubbed effluent complies with this emission limit.

The opacity monitoring plan for Boiler 2 requires that scrubber operating parameters be monitored and controlled to ensure scrubber operating effectiveness. The combination of operating the scrubber in accordance with those parameters and the firing fuel oil that does not exceed sulfur content specifications will demonstrate continuing compliance with this particulate emission limit.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Visible Emissions

40 CFR 60.11(c); 40 CFR 60.43c(c); 40 CFR 60.43c(d); PTC No. P-05030, Condition 2.3

On and after the date on which the initial performance test is completed or required to be completed under 40 CFR 60.8, whichever date comes first, BAF shall not cause to be discharged into the atmosphere from Boiler 2 any gases that exhibit greater than 20%

opacity (six-minute average), except for one six-minute period (average) per hour of not more than 27% opacity in accordance with 40 CFR 60.43c(c).

The opacity standard under 40 CFR 60.43c(c) applies at all times, except during periods of startup, shutdown, or malfunction in accordance with 40 CFR 60.11(c) and 40 CFR 60.43c(d).

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.45c
NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho (approved by EPA Region X, 29 Sep 2005)
PTC No. P-050301, Condition 4.3
40 CFR 60.13
PTC No. P-050301, Condition 4.5
40 CFR 60.13(c)
40 CFR 60.13(b)
40 CFR 60.13(e)
40 CFR 60.13(h)

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

An initial performance test of Boiler 2 was conducted on June 6 and 8, 2006 verifying performance of the wet scrubber system used to control visible emissions while combusting fuel oil.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Visible emissions from Boiler 2 while firing fuel oil are controlled by a wet scrubber. The initial performance test demonstrated that the scrubbed exhaust complies with this emission limit.

The opacity monitoring plan for Boiler 2 requires that scrubber operating parameters be monitored and controlled to ensure scrubber operating effectiveness.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Sulfur Dioxide

40 CFR 60.42c(d), (g), (I) and (j); PTC No. P-05030, Condition 2.2

On and after the date on which the initial performance test is completed or required to be completed under 40 CFR 60.8, whichever date comes first, when oil is combusted in Boiler 2 BAF shall not cause to be discharged into the atmosphere from Boiler 2 any gases that contain SO2 in excess of 215 ng/J (0.50 lb/million Btu) heat input; or, as an alternative, when oil is combusted in Boiler 2 BAF shall not combust oil in Boiler 2 that contains greater than 0.5 weight percent sulfur.

Compliance with the fuel oil sulfur limits and emission limits of this section shall be determined on a 30-day rolling average basis. The SO2 emission limits and fuel oil sulfur limits under this section apply at all times, including periods of startup, shutdown, and malfunction. Only the heat input supplied to Boiler 2 from the combustion of oil is counted for this provision. No credit is provided for the heat input to Boiler 2 from other fuels or for heat derived from exhaust gases from other sources, such as internal combustion engines and kilns.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

40 CFR 60.46c
PTC No. P-050301, Condition 4.4
40 CFR 60.44c; PTC No. P-050301, Sec 4.2

40 CFR 60.8, 60.11
PTC No. P-050301, Sec 4.1
IDAPA 58.01.01.157
40 CFR 60.13(b)
40 CFR 60.13(e)
40 CFR 60.13(h)
40 CFR 60.7(f)
40 CFR 60.48c(i)
PTC No. P-050301, Condition 4.10.2
40 CFR 60.48c(g)
PTC No. P-050301, Condition 4.10.1
40 CFR 60.48c(b)
PTC No. P-050301, Condition 5.1.2
40 CFR 60.48c(d)
PTC No. P-050301, Condition 5.1.4
40 CFR 60.48c(e)
PTC No. P-050301, Condition 5.1.5
40 CFR 60.48c(j)
PTC No. P-050301, Condition 5.1.6
PTC No. P-050301, Condition 5.2

Evaluation of Current Compliance

In Compliance Now?

Yes.

Basis for Determining Current Compliance Status:

Compliance is based on engineering calculations of estimated emissions included in Appendices B and C.

Sulfur dioxide emissions are also monitored by a Continuous Emissions Measurement System (CEMS) operated and installed in accordance with the requirements of 40 CFR 60, Subpart Dc. A Relative Accuracy Test Audit of the CEMS for Boiler 2 was conducted on June 6 and 8, 2006. BAF is awaiting results of this audit.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated using CEMS data.

Reporting Methods and Frequencies

Monitoring data reports will be submitted every six months, in accordance with provisions of 40 CFR 60.48c, PTC No. P-050301, and the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Carbon Monoxide

PTC No. P-05030, Conditions 2.1 and 6

Emissions of carbon monoxide from the exhaust stack of Boiler 2 shall not exceed 6.1 lb/hr.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance with the emission limit is based on emission calculation methods used by DEQ in the permit analysis and from tuning of Boiler 1 in accordance with PTC No. P-050301, Condition 3.8. Tuning of the boiler helps ensure that the emission factors used to estimate emissions are still valid.